

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

UNITED STATES OF AMERICA	)	Crim. No. <u>3:17-00811-MGL</u>
	)	21 USC 846
v.	)	21 USC 841(a)(1)
	)	21 USC 841(b)(1)(A)
GLENN QUANTA PERNELL	)	21 USC 841(b)(1)(B)
a/k/a "GP"	)	21 USC 841(b)(1)(C)
DONALD LEE ROBINSON	)	21 USC 843(b)
a/k/a "Don"	)	18 USC 922(g)(1)
ANTONIO DEBOR GOWANS	)	18 USC 924(a)(2)
a/k/a "Twin"	)	18 USC 924(e)
DANIELLE JOHNNIE SARVIS	)	7 USC 2156(b)
a/k/a "Snow Bunny"	)	18 USC 49
WHITNEY SAD'E PERNELL	)	18 USC 2
HATTIE F. PERNELL	)	7 USC 2156(f)
FATIMA FLESINEARS FORD	)	18 USC 924(d)
a/k/a "Tima"	)	21 USC 853
MYRA L. DIXON	)	21 USC 881
CYNTHIA JANTORIA WILLIAMS	)	28 USC 2461(c)
a/k/a "Cent"	)	
SANTERRIO MONTINEZ SMITH	)	
a/k/a "Big Boy"	)	
a/k/a "Yodi"	)	
a/k/a "Terrio"	)	SUPERSEDING INDICTMENT
DANTRELL MARKEIS SMITH	)	
a/k/a "Big Baby"	)	
KEVIN GERARD MULLINS	)	
a/k/a "K-Loe"	)	
TERRENCE VERNON DUNLAP	)	
a/k/a "Tex"	)	
STACEY VALLARIO FULLER	)	
a/k/a "Boon"	)	
a/k/a "Killer"	)	
KEVIN BARRY MYERS	)	
a/k/a "Baldhead"	)	
ELIJAH TYRONE DAVIS	)	
a/k/a "Ty"	)	
JAMES EARL GREEN	)	
a/k/a "Denny"	)	

COUNT 1

## THE GRAND JURY CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around May 2016, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina, the defendants, **GLENN QUANTA PERNELL, a/k/a "GP," DONALD LEE ROBINSON, a/k/a "Don," ANTONIO DEBOR GOWANS, a/k/a "Twin," DANIELLE JOHNNIE SARVIS, a/k/a "Snow Bunny," WHITNEY SAD'E PERNELL, HATTIE F. PERNELL, FATIMA FLESINEARS FORD, a/k/a "Tima," MYRA L. DIXON, CYNTHIA JANTORIA WILLIAMS, a/k/a "Cent," SANTERRIO MONTINEZ SMITH, a/k/a "Big Boy," a/k/a "Yodi," a/k/a "Terrio," DANTRELL MARKEIS SMITH, a/k/a "Big Baby," KEVIN GERARD MULLINS, a/k/a "K-Loe," TERRENCE VERNON DUNLAP, a/k/a "Tex," STACEY VALLARIO FULLER, a/k/a "Boon," a/k/a "Killer," KEVIN BARRY MYERS, a/k/a "Baldhead," and ELIJAH TYRONE DAVIS, a/k/a "Ty,"** knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute cocaine and cocaine base (commonly known as "crack" cocaine), both Schedule II controlled substances, and heroin, a Schedule I controlled substance;

- a. With respect to **GLENN QUANTA PERNELL**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine and a kilogram or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- b. With respect to **DONALD LEE ROBINSON**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine and a kilogram or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- c. With respect to **ANTONIO DEBOR GOWANS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine and a kilogram or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- d. With respect to **DANIELLE JOHNNIE SARVIS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture or substance containing cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);
- e. With respect to **WHITNEY SAD'E PERNELL**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 5 kilograms or more of a mixture or substance containing cocaine and a kilogram or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- f. With respect to **HATTIE F. PERNELL**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);
- g. With respect to **FATIMA FLESINEARS FORD**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 5 kilograms or more of a mixture or substance containing cocaine

and a kilogram or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- h. With respect to **MYRA L. DIXON**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 5 kilograms or more of a mixture or substance containing cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- i. With respect to **CYNTHIA JANTORIA WILLIAMS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 5 kilograms or more of a mixture or substance containing cocaine, and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- j. With respect to **SANTERRIO MONTINEZ SMITH**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine, 280 grams or more of a mixture or substance containing cocaine base, and 100 grams or more of a mixture or

substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);

- k. With respect to **DANTRELL MARKEIS SMITH**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine, 280 grams or more of a mixture or substance containing cocaine base, and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- l. With respect to **KEVIN GERARD MULLINS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine and 100 grams or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);
- m. With respect to **TERRENCE VERNON DUNLAP**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine and 100 grams or more of a mixture or substance containing heroin,



in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);

- n. With respect to **STACEY VALLARIO FULLER**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of a mixture or substance containing cocaine, 280 grams or more of a mixture or substance containing cocaine base, and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- o. With respect to **KEVIN BARRY MYERS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture or substance containing cocaine and 100 grams or more of a mixture or substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);
- p. With respect to **ELIJAH TYRONE DAVIS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture or substance containing cocaine, and a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C);

All in violation of Title 21, United States Code, Section 846.

COUNTS 2 – 27

THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, in the District of South Carolina, the defendants listed below knowingly and intentionally did use a communication facility, that is, a telephone, to facilitate the commission of a felony under the Controlled Substances Act, to wit: conspiracy to distribute, possession with intent to distribute, and distribution of cocaine and cocaine base (commonly known as "crack" cocaine), both Schedule II controlled substances, and heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846;

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>
2	5/24/17	<b>GLENN QUANTA PERNELL DONALD LEE ROBINSON</b>
3	5/24/17	<b>GLENN QUANTA PERNELL DONALD LEE ROBINSON</b>
4	5/8/17	<b>GLENN QUANTA PERNELL ANTONIO DEBOR GOWANS</b>
5	6/11/17	<b>GLENN QUANTA PERNELL ANTONIO DEBOR GOWANS</b>
6	6/2/17	<b>GLENN QUANTA PERNELL DANIELLE JOHNNIE SARVIS</b>
7	6/11/17	<b>GLENN QUANTA PERNELL DANIELLE JOHNNIE SARVIS</b>



<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>
8	5/22/17	GLENN QUANTA PERNELL WHITNEY SAD'E PERNELL
9	6/26/17	GLENN QUANTA PERNELL WHITNEY SAD'E PERNELL
10	6/14/17	GLENN QUANTA PERNELL HATTIE F. PERNELL
11	6/14/17	GLENN QUANTA PERNELL HATTIE F. PERNELL
12	5/28/17	GLENN QUANTA PERNELL FATIMA FLESINEARS FORD
13	5/29/17	GLENN QUANTA PERNELL FATIMA FLESINEARS FORD
14	5/28/17	GLENN QUANTA PERNELL MYRA L. DIXON KEVIN GERARD MULLINS
15	6/1/17	GLENN QUANTA PERNELL MYRA L. DIXON KEVIN GERARD MULLINS
16	5/13/17	GLENN QUANTA PERNELL CYNTHIA JANTORIA WILLIAMS
17	6/1/17	GLENN QUANTA PERNELL CYNTHIA JANTORIA WILLIAMS
18	4/8/17	SANTERRIO MONTINEZ SMITH DANTRELL MARKEIS SMITH
19	4/24/17	DANTRELL MARKEIS SMITH
20	4/4/17	SANTERRIO MONTINEZ SMITH TERRENCE VERNON DUNLAP

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>
21	4/5/17	<b>SANTERRIO MONTINEZ SMITH TERRENCE VERNON DUNLAP</b>
22	4/2/17	<b>SANTERRIO MONTINEZ SMITH STACEY VALLARIO FULLER</b>
23	4/8/17	<b>SANTERRIO MONTINEZ SMITH STACEY VALLARIO FULLER</b>
24	4/9/17	<b>SANTERRIO MONTINEZ SMITH KEVIN BARRY MYERS</b>
25	4/18/17	<b>SANTERRIO MONTINEZ SMITH KEVIN BARRY MYERS</b>
26	4/4/17	<b>SANTERRIO MONTINEZ SMITH ELIJAH TYRONE DAVIS</b>
27	4/14/17	<b>SANTERRIO MONTINEZ SMITH ELIJAH TYRONE DAVIS</b>

All in violation of Title 21, United States Code, Section 843(b).

COUNTS 28 – 49

## THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, in the District of South Carolina, the defendants listed below, knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute a quantity of the controlled substance described below:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>CONTROLLED SUBSTANCE</u>
28	5/20/16	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
29	5/23/16	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
30	9/13/16	<b>KEVIN BARRY MYERS</b>	heroin
31	9/16/16	<b>KEVIN BARRY MYERS</b>	heroin
32	9/19/16	<b>KEVIN BARRY MYERS</b>	heroin
33	9/27/16	<b>KEVIN BARRY MYERS</b>	heroin
34	10/4/16	<b>KEVIN BARRY MYERS</b>	heroin
35	10/31/16	<b>KEVIN BARRY MYERS</b>	heroin
36	11/30/16	<b>KEVIN BARRY MYERS</b>	heroin
37	1/5/17	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
38	1/6/17	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
39	1/11/17	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
40	1/25/17	<b>DANTRELL MARKEIS SMITH</b>	cocaine base

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>	<u>CONTROLLED SUBSTANCE</u>
41	1/30/17	<b>KEVIN BARRY MYERS SANTERRIO MONTINEZ SMITH</b>	heroin
42	2/6/17	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
43	2/8/17	<b>ELIJAH TYRONE DAVIS</b>	cocaine base
44	2/10/17	<b>DANTRELL MARKEIS SMITH</b>	cocaine base
45	3/22/17	<b>KEVIN BARRY MYERS</b>	cocaine base heroin
46	4/3/17	<b>KEVIN BARRY MYERS</b>	heroin
47	4/11/17	<b>KEVIN BARRY MYERS</b>	heroin
48	4/15/17	<b>ELIJAH TYRONE DAVIS</b>	cocaine base
49	6/1/17	<b>TERRENCE VERNON DUNLAP</b>	cocaine base

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 50

THE GRAND JURY FURTHER CHARGES:

That on or about July 3, 2017, in the District of South Carolina, the Defendant, **CYNTHIA JANTORIA WILLIAMS, a/k/a "Cent,"** knowingly, intentionally and unlawfully did possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 51

THE GRAND JURY FURTHER CHARGES:

That on or about September 20, 2017, in the District of South Carolina, the defendant, **DONALD LEE ROBINSON, a/k/a "Don,"** having been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess, in and affecting commerce, a firearm and ammunition, all of which had been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 924(e).

COUNT 52

THE GRAND JURY FURTHER CHARGES:

That on or about September 20, 2017, in the District of South Carolina, the defendant, **JAMES EARL GREEN, a/k/a "Denny,"** having been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess, in and affecting commerce, firearms and ammunition, all of which had been shipped and transported in interstate commerce;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 924(e).

COUNT 53

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around March 2017, and continuing through at least September 2017, in the District of South Carolina and elsewhere, the defendants, **SANTERRIO MONTINEZ SMITH, a/k/a "Big Boy," a/k/a "Yodi," a/k/a "Terrio," DANTRELL MARKEIS SMITH, a/k/a "Big Baby,"** and **JAMES EARL GREEN, a/k/a "Denny,"** knowingly did buy, possess, train, transport, and receive animals in interstate commerce for purposes of having the animals participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(g)(1);

In violation of Title 7, United States Code, Section 2156(b) and Title 18, United States Code, Sections 49 and 2.



## **FORFEITURE**

### **DRUG OFFENSES:**

Upon conviction for one or more violations of Title 21, United States Code, as charged in this Superseding Indictment, the Defendants, **GLENN QUANTA PERNELL, a/k/a "GP," DONALD LEE ROBINSON, a/k/a "Don," ANTONIO DEBOR GOWANS, a/k/a "Twin," DANIELLE JOHNNIE SARVIS, a/k/a "Snow Bunny," WHITNEY SAD'E PERNELL, HATTIE F. PERNELL, FATIMA FLESINEARS FORD, a/k/a "Tima," MYRA L. DIXON, CYNTHIA JANTORIA WILLIAMS, a/k/a "Cent," SANTERRIO MONTINEZ SMITH, a/k/a "Big Boy," a/k/a "Yodi," a/k/a "Terrio," DANTRELL MARKEIS SMITH, a/k/a "Big Baby," KEVIN GERARD MULLINS, a/k/a "K-Loe," TERRENCE VERNON DUNLAP, a/k/a "Tex," STACEY VALLARIO FULLER, a/k/a "Boon," a/k/a "Killer," KEVIN BARRY MYERS, a/k/a "Baldhead," and ELIJAH TYRONE DAVIS, a/k/a "Ty,"**, shall forfeit to the United States all of the Defendants' right, title and interest in and to any property, real and personal,

- A. constituting or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violations of Title 21, United States Code, and all property traceable to such property; or
- B. used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code.

FIREARM OFFENSES:

Upon conviction of violations of Title 18 as charged in this Superseding Indictment, the Defendants, **DONALD LEE ROBINSON, a/k/a "Don"** and **JAMES EARL GREEN, a/k/a "Denny"**, shall forfeit to the United States all of the Defendants' right, title and interest in and to any property, real and personal, including any firearms and ammunition (as defined in 18 U.S.C. § 921) involved in or used in any knowing violations of 18 U.S.C. § 922, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

ANIMAL WELFARE ACT VIOLATIONS:

Upon conviction for violations of Title 7, United States Code, Section 2156 as charged in this Superseding Indictment, the Defendants, **SANTERRIO MONTINEZ SMITH, a/k/a "Big Boy," a/k/a "Yodi," a/k/a "Terrio,"** **DANTRELL MARKEIS SMITH, a/k/a "Big Baby,"** and **JAMES EARL GREEN, a/k/a "Denny"**, shall forfeit to the United States any property, real or personal, involved in or facilitating such offenses.

PROPERTY:

Pursuant to Title 7, United States Code, Section 2156(f), Title 18, United States Code, Section 924(d), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property subject to forfeiture upon conviction of the Defendants for the offenses charged in this Superseding Indictment is, but is not limited, to the following:

(1) Proceeds/Money Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in this Superseding Indictment, and all interest and proceeds traceable thereto as a result for their violations of 21 U.S.C. §§ 841, 843, and 846.

(2) Cash/United States Currency:

- A. \$1,445.00 in United States Currency  
Seized from: Fatima Ford  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005748
- B. \$28,080.00 in United States Currency  
Seized from: James Earl Green  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005747
- C. \$3,975.00 in United States Currency  
Seized from: Hattie Pernell  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005906
- D. \$13,501.00 in United States Currency  
Seized from: Donald Robinson  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005905

(3) Vehicles:

- A. 2012 Dodge Charger  
VIN: 2C3CDXBGXCH287369  
Seized from: Dantrell Markeis Smith  
Seizure Date: November 2, 2017  
Asset ID: 18-FBI-000345
- B. Ford F150 XLT Crew Cab Truck  
VIN: 1FTFW1EF1CFC70657  
Seized from: Santerrio Smith  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005907

(4) Miscellaneous Jewelry:

10 karat yellow gold small nugget ring with two small diamond chips; 10 karat yellow gold medium size nugget ring; 10 karat yellow gold large size nugget ring; 10 karat yellow gold ring with Onyx stone and diamond chips; 10 karat yellow gold ring with diamond melee face; 10 karat yellow gold Figaro link bracelet; 10 karat yellow gold 20" rope chain; 14 karat yellow gold large size nugget ring; 14 karat yellow gold 20" rope chain; 14 karat yellow gold pendant marked "VON"; and 14 karat yellow gold pendant marked "14K"

Seized from: Donald Robinson

Seizure Date: September 20, 2017

Asset ID: 17-FBI-005904

(5) Firearms and Ammunition:

A. High Standard 12 gauge shotgun  
(Serial No. 3128081), and  
6 rounds of 12 gauge shotgun shells  
Seized from: Donald Robinson  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005750

B. FIE Titan Tiger .38 caliber Revolver  
(Serial No. 020459); Beretta Pietro SPA A400  
Extreme 12 gauge Shotgun (Serial No. XA050535);  
Remington Arms 31L 12 gauge Shotgun  
(Serial No. 573114); Marlin Firearms .22  
caliber Rifle (Serial No. 19428549);  
Harrington & Richardson 929 .22 caliber  
Revolver (Serial No. W14039); Remington Arms  
700 30-06 caliber rifle (Serial No. A6336496);  
Winchester .22 caliber rifle (Serial No.  
267361); Springfield Armory 1898 Rifle (Serial  
No. 205460); Western Auto Revelation 300 12  
gauge Shotgun (Serial No. Obliterated);  
(1) Rifle Sling; (1) Rifle Sling; (1) Shotgun  
Sling, Camouflage; (1) Tasco Scope; 3 Rounds  
of .38 Special ammunition; 44 Rounds of 12  
gauge Shotgun shells; 2 Rounds of .22 caliber  
ammunition; 9 Rounds of .22 caliber

ammunition; 1 Round 12 gauge Shotgun shell; 16 rounds of 16.8 caliber ammunition; 1 Box of .410 caliber shotgun shells; 9 rounds of .40 caliber ammunition; and 1 Glock 23 magazine  
Seized from: James Earl Green  
Seizure Date: September 20, 2017  
Asset ID: 17-FBI-005749

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the said Defendants up to the value of the above described forfeitable property.

Pursuant to Title 7, United States Code, Sections 2156(f), Title 18, United States Code, Section 924(d), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A TRUE Bill



FOREPERSON

A handwritten signature in cursive script, appearing to read "Beth Drake", written over a horizontal line.

BETH DRAKE (jbt)  
UNITED STATES ATTORNEY